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 12 Administration in its capacity as Receiver for Rocket  
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17 Attorney for Defendants  
 18 Paul Cantwell, Melissa Baldwin, Kenneth Baldwin, Craig  
 19 Foster Heimark, Richard S. Cuccioli,  
 and Thomas Tynan

20 UNITED STATES DISTRICT COURT  
 21 NORTHERN DISTRICT OF CALIFORNIA  
 22 SAN FRANCISCO DIVISION

23 United States Small Business Administration in  
 24 its capacity as Receiver for Rocket Ventures II  
 25 SBIC, L.P.,

Case No.: CV-10-4425 JSW

26 Plaintiff,

27 **CAPTION CONTINUED ON NEXT PAGE**

1 vs.

Case No.: CV-10-4425 JSW

2 Rocket Ventures II, L.P., a California limited  
3 partnership; Rocket Ventures II CEO Fund, L.P.,  
4 a California limited partnership; Rocket  
5 Ventures SBIC Partners, LLC, a Delaware  
6 limited liability company; Cordusio Societa  
7 Fiduciaria Per Azioni Lozia Federico; Kenneth  
8 W.& Melissa Baldwin; Paul Cantwell; Peter  
9 Ayrton Cheese; Yves Derville; Richard S.  
10 Cuccioli; Alistair Anderson Donald; Philippe  
11 Gire; Jean-Claude Guez; Joseph Hawes &  
12 Christopher Eyden; Alan John Healey; Craig  
13 Foster Heimark; David E. Kropp; Gregory  
14 Charles Meekings; Michele Liberato; Fred  
15 Cucchi; ValorLife; Alberto Gandini; Rijete Pty.  
16 Ltd.; Christopher Stainton; Tyna Development;  
17 Thomas Tynan; Patrice Vinet; Hahei Limited;  
18 Michel Saunier; Michel Roujansky; Nigel  
19 Backwith; Justine Lumb; Andrew Middleton;  
20 Ajmair Singh Bhullar; Estate of Grant A. Dove;  
21 Luca Casiraghi; David Mather,

22 Defendants.

**STIPULATION BETWEEN PLAINTIFF  
RECEIVER AND DEFENDANTS  
PAUL CANTWELL, MELISSA  
BALDWIN, KENNETH BALDWIN,  
CRAIG FOSTER HEIMARK, RICHARD  
S. CUCCIOLI, AND THOMAS TYNAN  
FOR ADDITIONAL FIFTEEN DAYS TO  
RESPOND TO AMENDED  
COMPLAINT; [~~PROPOSED~~] ORDER**

23 Plaintiff United States Small Business Administration in its capacity as Receiver for  
24 Rocket Ventures II SBIC, L.P., ("Plaintiff Receiver") and newly added Defendants Paul  
25 Cantwell, Melissa Baldwin, Kenneth Baldwin, Craig Foster Heimark, Richard Cuccioli and  
26 Thomas Tynan, (the "Newly Named Defendants")<sup>1</sup>, by and through their respective counsel of  
27 record, hereby stipulate and agree as follows:

28 **WHEREAS,**

Plaintiff Receiver filed an Amended Complaint on January 18, 2012; and

The time previously set for Newly Named Defendants to respond to the Amended  
Complaint has been ordered to be on or before March 21, 2012; and

The time previously set for Newly Named Defendants to respond to the Amended  
Complaint has been ordered to be on or before April 12, 2012; and

<sup>1</sup> By filing an Appearance and entering this Stipulation, the Newly Named Defendants do not  
waive any potential objections to personal jurisdiction or service of process.

1 The parties are currently involved in settlement discussions to resolve the claims against  
2 the Newly Named Defendants; and

3 The Newly Named Defendants have requested an additional fifteen days to allow them to  
4 submit a settlement proposal for review by the Receiver prior to the time they are required to  
5 respond to the Amended Complaint;

6 **NOW, THEREFORE,**

7 The Plaintiff Receiver and the Newly Named Defendants hereby agree that the time for  
8 the Newly Named Defendants to respond to the Amended Complaint shall be extended fifteen  
9 days and the Newly Named Defendants shall have up to, and including, April 27, 2012 to  
10 answer, move, or otherwise respond to the Amended Complaint.

11 **IT IS SO STIPULATED:**

12 Dated: April 11, 2012

13 SCHNADER HARRISON SEGAL & LEWIS LLP

14  
15 By: /s/ T. Scott Tate  
16 T. Scott Tate  
17 Attorneys for Plaintiff  
18 United States Small Business  
19 Administration in Its Capacity as Receiver  
20 for Rocket Ventures II SBIC, L.P.  
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1 Dated: April 11, 2012

BRYAN CAVE LLP

2  
3 By: /s/ Tracy M. Talbot

4 Tracy M. Talbot

5 Attorney for Defendants

Paul Cantwell, Melissa Baldwin, Kenneth Baldwin

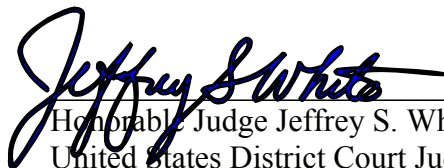
6 Craig Foster Heimark, Richard S. Cuccioli,

and Thomas Tynan

7  
8  
9 **PROPOSED ORDER**

10 Pursuant to stipulation, IT IS SO ORDERED:

11  
12 Dated: April 13, 2012

13 

Honorable Judge Jeffrey S. White

United States District Court Judge

Northern District of California

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